

United States District Court:

Dated: Dec. 11<sup>th</sup>, 2024

Southern District of New York:

MR. JEREMIAH Folsom HERBERT, PRO-SE, Plaintiff

- Against -

Notice of motion

J. George, etc. Al, Defendants

Motion under Rule 45 Request Subpoena

PURSUANT TO Rule 45 OF Federal Rules OF

Civil Procedure, The

This Court Issue

FOR Expert Testimony

Doctor Williams Shall

Before The Court As

#1) Plaintiff Request

Testify AS A Medical

Doctor Williams, Can

ABOUT JAN. 29<sup>th</sup>, 2024 Physical INJURYS Imposed

UPON Plaintiff AT Sing-Sing Correctional Facility.

#2) Plaintiff, Request For Subpoena Shall Be granted

FOR Doctor Williams Performed ON JAN. 29, JAN. 30<sup>th</sup>, 2024

Medical EXRAYS AND Medical M.R.I. Supported

By Medical Records TO Show How Plaintiff Did

IN FACT SUFFER Physical Harm AND INJURYS

Because OF Defendants J. George, Johnson,

Sergeant Ridley, Officer Camron, Officer M. Salas.

#3) Doctor Williams Shall Be Called AS A

Expert IN Medical And Will Testify ABOUT

Imposed INJURYS:

A) Vision TO Eyes

B) Bleeding FROM Head

C) Cut TO Right Cheek ON Plaintiff's Face!

Plaintiff's motions for the issuance of a subpoena (Doc. 36) and for a writ of habeas corpus ad testificandum directing DOCCS to produce incarcerated witnesses (Doc. 37) are denied as premature. Defendants' motion to dismiss the complaint is currently pending. (See Doc. 31).

The Clerk of Court is respectfully directed to terminate the letter sequence pending at Docs. 36-37 and mail a copy of this Order to Plaintiff.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
December 23, 2024

24-CV-1780 PMH/VR Page #21

As Requested under Federal Rule 45 For An  
Issuance of Subpoena directing Doctor Williams  
of Westaher Medical Center As A Medical /  
Doctor Expert, Expert Testimony By Doctor  
Williams About How on Jan. 29th, 2024 Doctor  
Williams Performed medical EXRAYS And medical  
M.R.I. Because of Failure to protect Assault  
And Excessive Force; Doctor Williams Can  
Give A Detailed Account About The Physical  
INJURYs Imposed To plaintiff Such As:

- A) Bleeding From Head
- B) Neck And upper Back INJURYs
- C) Cut with RAZOR TO Right Side of Cheek
- D) Impaired Vision TO Right Eye

Doctor Williams Shall Be Produced As A Witnesses  
And As A Medical expert About How plaintiff  
Did IN Fact Suffer Imminent harm under  
Color of law About event TO occurred At  
Sing-Sing Correctional Facility Inside A-Block  
yard On Jan. 29th, 2024.

A Subpoena For Expert Testimony under Rule  
45 shall Be granted And Doctor Williams  
Testimony Shall Be Admissible And shall Be  
Allowed to Be Called to personally Testify  
Before Court At TRIAL As An expert  
And As A Witness By Way of A  
Subpoena under Rule 45, Respectfully submitted;  
Cecile Ziah